

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEREK TUCSON, ROBIN SNYDER,
MONSIEREE DE CASTRO, and ERIK
MOYA-DELGADO,

Plaintiffs,

vs.

CITY OF SEATTLE, ALEXANDER
PATTON, TRAVIS JORDAN, DYLAN
NELSON, JOHN DOES (#1-4) AND JANE
DOES (#1-2)

Defendants.

No. 2:23-cv-00017MJP

**DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO FILE
SUPPLEMENTAL COMPLAINT**

Although Defendants City of Seattle (the City), Alexander Patton, Travis Jordan, and Dylan Nelson note that “a plaintiff cannot cure a defective complaint by a supplement alleging subsequently occurring events,” they do not object to Plaintiffs’ Motion to File Supplemental Complaint. *La Salle Nat. Bank v. 222 East Chestnut St. Corp.*, 267 F.2d 247, 252 (7th Cir. 1959) *cert. denied* 361 U.S. 836 (1959). Defendants do, however, ask that if the Court grants Plaintiffs’ Motion to File Supplemental Complaint, the Court also provides Defendants two weeks to respond.

DATED this 10th day of April, 2023.

RESPONSE TO MOTION TO FILE
SUPPLEMENTAL COMPLAINT - 1
2:23-cv-00017 TLF

Ann Davison
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

ANN DAVISON
Seattle City Attorney

By: /s/Kerala Cowart
Kerala Cowart, WSBA# 53649
Jessica Leiser, WSBA# 49349
Assistant City Attorneys

E-mail: kerala.cowart@seattle.gov
E-mail: jessica.leiser@seattle.gov

Seattle City Attorney's Office
701 Fifth Avenue, Suite 2050
Seattle, WA 98104
Phone: (206) 684-8200

*Attorneys for Defendant City of Seattle, Alexander Patton, Travis
Jordon, Dylan Nelson*